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Attorneys for Service Employees International Union  
and Mary Kay Henry

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JAVIER CABRERA, an individual;  
DEBORAH MILLER, an individual,  
CHERIE MANCINI, an individual,  
NEVADA SERVICE EMPLOYEES UNION  
STAFF UNION ("NSEUSU"),  
an unincorporated association,

Plaintiffs,

vs.

SERVICE EMPLOYEES INTERNATIONAL  
UNION, a nonprofit cooperative corporation;  
LUISA BLUE, in her official capacity as  
Trustee of Local 1107; MARTIN MANTECA,  
in his official capacity as Deputy Trustee of  
Local 1107; MARY K. HENRY, in her official  
capacity as Union President; CLARK COUNTY  
PUBLIC EMPLOYEES ASSOCIATION dba  
NEVADA SERVICE EMPLOYEES UNION  
aka SEIU 1107, a non-profit cooperative  
corporation; DOES 1-20; and ROE  
CORPORATIONS 1-20, inclusive,

Defendants.

Case No.: 2:18-cv-00304-RFB-DJA

**JOINT STIPULATION AND REQUEST  
TO RESCHEDULE SETTLEMENT  
CONFERENCE;  
DECLARATION OF COUNSEL**

On June 6, 2021, based upon the parties' joint request and the Court's referral (ECF No. 241), the Magistrate Judge ordered a mandatory settlement conference to be held on August 2, 2021 (ECF No. 242). Unfortunately, counsel for Defendant Service Employees International Union is not available on that date, due to pre-planned vacation travel. *See Declaration of Eli Naduris-Weissman.*

Counsel for all parties have spoken with their clients or client representatives and met and conferred to find alternative dates of availability, and hereby stipulate to their availability and request to reschedule the settlement conference to either of the following dates: August 13, 2021 or August 31, 2021.

Respectfully submitted,

CHRISTENSEN JAMES & MARTIN

ROTHNER, SEGALL & GREENSTONE

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*Attorney for Plaintiffs*

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2021

\_\_\_\_\_  
 Daniel J. Albregts  
 United States Magistrate Judge

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Case No.: 2:18-cv-00304-RFB-DJA

**DECLARATION OF ELI NADURIS-  
WEISSMAN**

**Declaration of Eli Naduris-Weissman**

I, Eli Naduris-Weissman, declare that:

1. [Identify] I am a member of the law firm of Rothner, Segall & Greenstone and am counsel to Defendant Service Employees International Union (“SEIU”) in this case. I have litigated this case extensively since SEIU’s involvement, and am the attorney at my firm most familiar with the facts and legal issues at stake in this case.

2. [Unavailability for Settlement Conference] Prior to receiving the Order scheduling a settlement conference, I had already prepared travel plans and purchased tickets for a family vacation and will be unavailable from July 26 through August 10, 2021. As such, I am unable to attend the settlement conference on the currently scheduled date of August 2, 2021.

3. [Availability of All Parties] I have confirmed availability of SEIU’s client representative, and conferred with the counsel signing this stipulation who have indicated their availability, and their clients’ availability, on August 13, 2021 and August 31, 2021.

I declare, under penalty of perjury under the laws of the United States, that the foregoing is true and correct. Executed this 14<sup>th</sup> day of June, 2021, at Pasadena, California.

/s/ Eli Naduris-Weissman  
Eli Naduris-Weissman

**CERTIFICATE OF SERVICE**

I am a member of Rothner, Segall & Greenstone. On this 15<sup>th</sup> day of June, 2021, I caused a true and correct copy of the foregoing **JOINT STIPULATION AND REQUEST TO RESCHEDULE SCHEDULING CONFERENCE; DECLARATION OF COUNSEL** to be served in the following manner:

✓ ELECTRONIC SERVICE: Pursuant to [LR IC 4-1](#) of the United States District Court for the District of Nevada, the above-referenced document was electronically filed and served through the Notice of Electronic Filing automatically generated by the Court.

ROTHNER, SEGALL & GREENSTONE

By /s/ Eli Naduris-Weissman  
ELI NADURIS-WEISSMAN